

STATE OF NORTH CAROLINA  
COUNTY OF WAKE



BEFORE THE  
DISCIPLINARY HEARING COMMISSION  
OF THE NORTH CAROLINA STATE BAR  
12 DHC 20

NORTH CAROLINA STATE BAR,  
Plaintiff,

vs.

ANSWER

MARSHALL F. DOTSON III, Attorney  
Defendant.

Defendant, answering the correspondingly numbered allegations contained in Plaintiff's Complaint, avers and says:

1. The allegations contained in Paragraph 1 of Plaintiff's Complaint are admitted.
2. The allegations contained in Paragraph 2 of Plaintiff's Complaint are admitted.
3. The allegations contained in Paragraph 3 of Plaintiff's Complaint are admitted.
4. As to the allegations contained in Paragraph 4 of Plaintiff's Complaint no response is necessary.
5. The allegations contained in Paragraph 5 of Plaintiff's Complaint are admitted.
6. The allegations contained in Paragraph 6 of Plaintiff's Complaint are admitted.
7. The allegations contained in Paragraph 7 of Plaintiff's Complaint are admitted.
8. The allegations contained in Paragraph 8 of Plaintiff's Complaint are admitted.
9. The allegations contained in Paragraph 9 of Plaintiff's Complaint are admitted.
10. The allegations contained in Paragraph 10 of Plaintiff's Complaint are admitted.
11. The allegations contained in Paragraph 11 of Plaintiff's Complaint are admitted.
12. The allegations contained in Paragraph 12 of Plaintiff's Complaint are admitted.
13. The allegations contained in Paragraph 13 of Plaintiff's Complaint are admitted to the extent that Ms. Johnson-Paris would provide a copy of the prior deed that would contain the necessary information to prepare a new quitclaim deed.
14. The allegations contained in Paragraph 14 of Plaintiff's Complaint are admitted.
15. The allegations contained in Paragraph 15 of Plaintiff's Complaint are admitted.

16. The allegations contained in Paragraph 16 of Plaintiff's Complaint are admitted.
17. The allegations contained in Paragraph 17 of Plaintiff's Complaint are admitted.
18. The allegations contained in Paragraph 18 of Plaintiff's Complaint are admitted.
19. The allegations contained in Paragraph 19 of Plaintiff's Complaint are admitted.
20. The allegations contained in Paragraph 19 of Plaintiff's Complaint are admitted.
21. The allegations contained in Paragraph 21 of Plaintiff's Complaint are admitted.
22. The allegations contained in Paragraph 22 of Plaintiff's Complaint are admitted.
23. The allegations contained in Paragraph 23 of Plaintiff's Complaint are admitted.
24. The allegations contained in Paragraph 24 of Plaintiff's Complaint are admitted.
25. The allegations contained in Paragraph 25 of Plaintiff's Complaint are admitted.
26. The allegations contained in Paragraph 26 of Plaintiff's Complaint are admitted.
27. The allegations contained in Paragraph 27 of Plaintiff's Complaint are admitted.
28. The allegations contained in Paragraph 28 of Plaintiff's Complaint are admitted.
29. The allegations contained in Paragraph 29 of Plaintiff's Complaint are admitted.
30. The allegations contained in Paragraph 30 of Plaintiff's Complaint are admitted.
31. The allegations contained in Paragraph 31 of Plaintiff's Complaint are admitted.
32. The allegations contained in Paragraph 32 of Plaintiff's Complaint are admitted.
33. The allegations contained in Paragraph 33 of Plaintiff's Complaint are admitted.
34. The allegations contained in Paragraph 34 of Plaintiff's Complaint are admitted.
35. The allegations contained in Paragraph 35 of Plaintiff's Complaint are admitted.
36. The allegations contained in Paragraph 36 of Plaintiff's Complaint are admitted.
37. The allegations contained in Paragraph 37 of Plaintiff's Complaint are admitted.
38. The allegations contained in Paragraph 38 of Plaintiff's Complaint are admitted.
39. The allegations contained in Paragraph 39 of Plaintiff's Complaint are admitted.
40. The allegations contained in Paragraph 40 of Plaintiff's Complaint are admitted.
41. The allegations contained in Paragraph 41 of Plaintiff's Complaint are admitted.

42. The allegations contained in Paragraph 42 of Plaintiff's Complaint are admitted.

43. As to the allegations contained in Paragraph 43 of Plaintiff's Complaint no response is necessary.

44. As to the allegations contained in Paragraph 44 of Plaintiff's Complaint, it is admitted that Mr. William Redding retained Defendant to research and investigate certain legal issues relating to certain real property. All other allegations are denied.

45. The allegations contained in Paragraph 45 of Plaintiff's Complaint are admitted.

46. As to the allegations contained in Paragraph 46 of Plaintiff's Complaint, it is admitted that Mr. William Redding retained Defendant to research and investigate certain rights arising out legal issues relating to certain real estate.. All other allegations are denied.

47. The allegations contained in Paragraph 47 of Plaintiff's Complaint are admitted.

48. The allegations contained in Paragraph 48 of Plaintiff's Complaint are admitted.

49. The allegations contained in Paragraph 49 of Plaintiff's Complaint are admitted.

50. The allegations contained in Paragraph 50 of Plaintiff's Complaint are admitted.

51. The allegations contained in Paragraph 51 of Plaintiff's Complaint are admitted.

52. The allegations contained in Paragraph 52 of Plaintiff's Complaint are admitted.

53. The allegations contained in Paragraph 53 of Plaintiff's Complaint are admitted.

54. The allegations contained in Paragraph 54 of Plaintiff's Complaint are admitted.

55. The allegations contained in Paragraph 55 of Plaintiff's Complaint are admitted.

56. The allegations contained in Paragraph 56 of Plaintiff's Complaint are admitted.

57. The allegations contained in Paragraph 57 of Plaintiff's Complaint are admitted.

58. The allegations contained in Paragraph 58 of Plaintiff's Complaint are admitted.

59. The allegations contained in Paragraph 59 of Plaintiff's Complaint are admitted.

60. The allegations contained in Paragraph 59 of Plaintiff's Complaint are admitted.

61. The allegations contained in Paragraph 61 of Plaintiff's Complaint are admitted.

62. The allegations contained in Paragraph 62 of Plaintiff's Complaint are admitted.

63. The allegations contained in Paragraph 63 of Plaintiff's Complaint are admitted.

64. The allegations contained in Paragraph 64 of Plaintiff's Complaint are admitted.

65. The allegations contained in Paragraph 65 of Plaintiff's Complaint are admitted.

66. The allegations contained in Paragraph 66 of Plaintiff's Complaint are admitted.

67. The allegations as to the purported incident as set forth in Paragraph 5 of the Plaintiff's Complaint are denied.

68. As to the allegations contained in Paragraph 68 of Plaintiff's Complaint, it is admitted that Defendant did not issue a refund of said fee. Based upon the work performed, Defendant had earned the fee paid through that point. Further Defendant only had copies of Mr. Redding's documents with the original documents being retained by Mr. Redding .

69. The allegations contained in Paragraph 69 of Plaintiff's Complaint are admitted.

70. The allegations contained in Paragraph 71 of Plaintiff's Complaint are admitted.

71. The allegations contained in Paragraph 71 of Plaintiff's Complaint are admitted.

72. The allegations contained in Paragraph 72 of Plaintiff's Complaint are admitted.

73. The allegations contained in Paragraph 73 of Plaintiff's Complaint are admitted.

74. The allegations contained in Paragraph 74 of Plaintiff's Complaint are admitted.

75. The allegations contained in Paragraph 75 of Plaintiff's Complaint are admitted.

76.. The allegations contained in Paragraph 76 of Plaintiff's Complaint are admitted.

77. The allegations contained in Paragraph 77 of Plaintiff's Complaint are admitted.

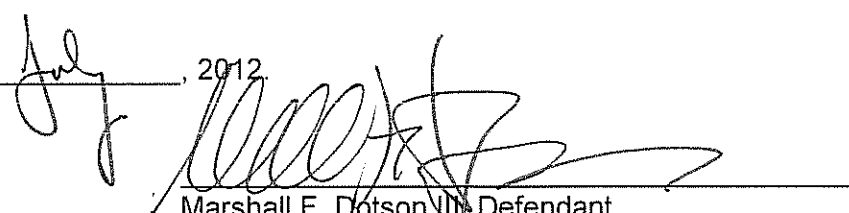
78. The allegations contained in Paragraph 78 of Plaintiff's Complaint are admitted.

WHEREFORE, Defendant prays of the Court as follows:

1. That Plaintiff's Complaint be dismissed in its entirety, and that Plaintiff have and recover nothing of Defendant.

2. That the Court grant Plaintiff such other and further relief as the Court may deem just and proper.

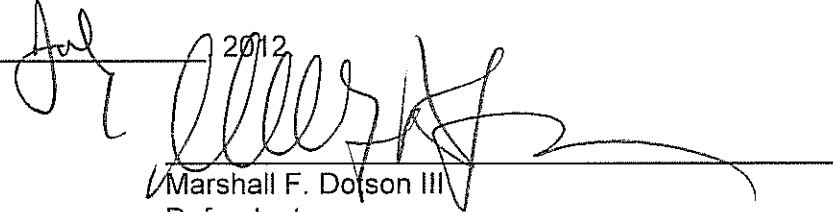
This the 21 day of July, 2012.

  
\_\_\_\_\_  
Marshall F. Dotson III Defendant  
110 Commerce Place  
Greensboro, North Carolina 27401  
Telephone: (336) 274-8888

CERTIFICATE OF SERVICE

I, Marshall F. Dotson III, do hereby certify that the foregoing Answer was served upon Plaintiff by hand delivering a copy thereof to Plaintiff and/or Plaintiff's attorney at the offices of the North Carolina State Bar, Raleigh, North Carolina.

This the 23 day of Jul 2012

  
\_\_\_\_\_  
Marshall F. Dotson III  
Defendant

MARSHALL F. DOTSON III  
Attorney at Law  
110 Commerce Place  
Greensboro, North Carolina 27401  
Telephone: (336) 274-8888